

# **PRIVACY NOTICE**

Note: The YCW has updated its Privacy Notice in light of the General Data Protection Regulations (GDPR) which comes into effect on the 28<sup>th</sup> May 2018.

We are committed to protecting personal information and we take our responsibilities in regards to the security of our volunteers information very seriously. This Privacy Notice explains what personal data we collect about you, how and why we use it, who we disclose it to and how we protect it.

The Young Christian Workers (YCW) wants a world where young people make a difference, in fact are the difference, to enable the transformation needed in order for everyone to live a life of dignity, worthy of the Creator. The YCW is a movement of young people, which is run by young people. It is made up of young people aged 17 - 30 who meet in small groups. They focus on their everyday experiences as young adults, reflect on them in the light of the Gospel and Church teaching and commit themselves to take authentic Christian action. In these regular group meetings, which always take place in the presence of a chaplain or adult companion, young people are called out of their isolation so that they come to know their true dignity and worth, which is so often not the case in modern life and especially in the world of work. As a movement of young people, the YCW recognises that young people are the experts of their own reality and are often the best placed people to be the means of transformation in their own lives and their lives of their peers. The YCW offers young adults a unique opportunity to link life and faith through a methodology that allows them to link the real experiences of their lives with their faith, enabling them to not only change the world around them but also to develop as Christian leaders in their own realities. The YCW in England and Wales is a member of the International Coordination of Young Christian Workers (ICYCW), which is officially recognised by the Holy See through the Pontifical Council for the Laity where it is regarded as an International Association of the Faithful. For more information on the ICYCW, please visit <a href="https://www.cijoc.org">www.cijoc.org</a>.

#### Who is responsible for your data

Our Privacy Notice applies to the personal data that the YCW collects and uses.

References in this Privacy Notice to "YCW", "WE" and "US" means the Young Christian Workers, a charity registered in England and Wales (number 306149). Our registered office is St Antony's House, Eleventh Street, Trafford Park, M17 1JF.

We control the ways your personal data is collected and the purposes for which your personal data is used by the YCW. We are the "data controller" for the purposes of the UK Data Protection Act 1998 and other applicable European data protection legislation such as the General Data Protection Regulations (GDPR).

The YCW has a designated Data Protection Officer who can be contacted via <a href="mailto:info@ycwimpact.com">info@ycwimpact.com</a>

# Personal data we collect about you

When using the term "personal data" in our Privacy Notice, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. We collect some personal data from you, for example, when you donate to the YCW, use our website, use our services or contact us.

#### What data we collect and when

We may collect and process the following categories of information about you:

**Personal information, including contact details:** For example, your name, postal address, telephone number, email address. We collect this when you contact us or donate by post, telephone or on our website.

**Bank details:** We collect your name, sort code and account number. We collect this when you set up a regular gift (eg, direct debit or standing order) with us or send us a cheque in the post.

**Communications:** We collect the communications you exchange with us. We collect this when you email us, write a letter or call us.

**Third party information:** We collect information indirectly from third parties such as event fundraising sites like MyDonate, where you have agreed to support us and have given your consent. We collect this information when you use a third party site such as MyDonate whereby the YCW is the named beneficiary. You may wish to check their Privacy Notice to find out more about how they will process your data.

**Non-personalised data:** We collect non-personal data such as IP addresses, details of web pages visited and files downloaded. Website usage information is collected using cookies. We collect this when you use our website.

**Social media:** We collect your posts and messages on social media directed at YCW. We collect this when you interact with us on social media platforms such as Facebook, Twitter or Instagram

**Website:** We collect Information about how our website is used, such as your searches for information. We collect this when you navigate on our website.

**Legacy administration:** We collect personal data necessary for legacy administration. We collect this when a supporter has died, leaving a legacy to the YCW, and you are the executor or you have an interest in the estate.

**Sensitive personal data:** We collect and use personal data you provide to us, as YCW supporters, to contact you and inform you about our activities. We recognise that many of our supporters (but not all) hold religious beliefs and, since this can be considered to be sensitive information, we put in place policies and procedures to ensure that your supporter data is kept secure. This information is only accessed on a need-to-know basis. Unless required by law or as otherwise described in this Privacy Notice, we do not disclose your personal data to any third party without your prior consent.

**Sharing your personal data:** The YCW does not share your data with any other charity, public body or commercial organisation, unless we have to do so either for legal or compliance reasons, or where it is more cost effective and efficient for us to use a third party to deliver a product or service on our behalf.

**Legal duty:** We may need to pass on personal information if required by law or by a regulatory body. For example, if requested as part of a Gift Aid audit or by a law enforcement agency.

Other service providers or third parties: We sometimes employ third party service providers to carry out tasks on our behalf. This can be because it is clearly more efficient for them to carry out certain tasks (such as when sending out large volume mailings) or when we do not have the capacity to do a specific task ourselves.

How and why we use your personal data;

We use your personal data for the following purposes:

- To manage your donations, requests or calls to action
- When you interact with us, we use your information to perform our services in relation to your donation, to deal with your queries and requests and to process responses to our work.
- To fundraise and promote the YCW's work, in both financial and non-financial ways

We know how fundamental our supporters and donors are to the work we do. In order to develop and foster your ongoing support, we want to keep in touch with you through feedback and further opportunities and invitations to support our work in both financial and non-financial ways.

## To communicate with you and manage our relationship with you

Occasionally we may need to contact you by mail, email and/or telephone for administrative or operational reasons. Please be aware that these communications are not made for marketing purposes and as such, you will continue to receive them even if you opt out of receiving marketing communications from us. We will also use your personal data if we contact you after you have sent us a request, filled in a web form through our website or contacted us on social media. Your views and opinions are very important to us, so we may send you a survey to seek your feedback. We will use the communications you exchange with us and the feedback you may provide to manage our relationship with you as a supporter of the YCW and to improve our services and communications.

## To personalise and improve your experience when engaging with the YCW

We strive to continually improve the information and services we offer to our supporters so that we can be good stewards of the resources entrusted to us. We may use your personal data to tailor our communications to your needs and preferences and to provide you with a more relevant experience. We may also collect information about how you use our website, which pages of our website you visit most, and what you search for to understand your preferences. We may use this information to tailor content and, if you have agreed to receive marketing communications, to send you relevant messages that we think would be of interest to you.

# To inform you about our news and ways you may be able to help the YCW

We may send you marketing communications, if you have indicated that you are happy to receive these. Please note that we do not share your contact details and other personal data with any other charities or companies for marketing purposes. If you do not want to receive marketing communications from us, you can simply tell us by contacting our Office on 0161 872 6017 or info@ycwimpact.com.

You can choose to opt out of receiving email marketing communications at any time by sending an e-mail to <a href="mailto:info@ycwimpact.com">info@ycwimpact.com</a> and insert the phrase "Opt-out" or "Unsubscribe" in the "Subject" line. You may also "Opt-out" or "Unsubscribe" by contacting us via post at Young Christian Workers, St Antony's House, Eleventh Street, Trafford Park, M17 1JF.

To maintain and improve our own accounts, records and organisational processes, to fulfil our administrative purposes and protect our charitable interests

The purposes for which we will use your information include accounting, billing and audit, credit or other payment card verification, fraud screening, safety, security and legal purposes, statistical and marketing analysis, legacy administration, systems testing, maintenance and development.

# Legal basis for processing your personal data

The General Data Protection Regulation requires organisations to consider the legal basis on which they process personal data. The YCW will process personal data in line with the following principles:

- Where it is necessary for us to fulfil a contract with you: for example, when you make a donation.
- With your consent: we will only send you emails, make telephone calls or send you SMS text messages with your explicit consent.
- When it is in our legitimate interests to do so: as part of our engagement and efforts to build long-term relationships with our supporters, we will send you communications and marketing material via post unless you have told us you do not wish to receive these communications. This need not be an "all or nothing" option. We maintain a wide range of communication preferences and options, so you can choose both the type of material (whether that's fundraising activities, volunteering) and the most convenient channel(s) for you to receive information from us (such as email, post, telephone or SMS).

#### Data analysis

We use Post Office address search, postcode lists and other sources to ensure the quality and accuracy of data you provide us – for example, where we cannot read information on a handwritten form. We do not attempt to complete any information you have chosen not to provide (for example, if you have left a telephone number blank). We do not routinely use external sources to update our database; for example, a change of address. We will normally rely on you to tell us if your details have changed. However, if you are an active giver and we find items such as newsletters are returned to us, we may use external sources to update your address so that we can maintain contact with you. Fundraising is a key part of the YCW's work. For this purpose, we may use profiling techniques in order to send you communications we believe may be of interest to you. This means we conduct analysis of information held on our database, such as previous behaviour (previous donations) or information supplied by our supporters, such as date of birth.

## Wealth screening

As the YCW is a fundraising charity, we are always grateful for any donation our supporters can give. Like the majority of other similar-sized UK charities we also build long-term relationships with individuals, private companies and family trusts and foundations that can support us with significant gifts, ensuring their donations make lasting positive change to the lives of young people. As part of our work, we may gather information about you from publicly available sources – for example, Companies House, the Electoral Register and the media – to help us to understand more about you as an individual and your ability to support our work. We may use information gathered from public sources, from networking events or from your colleagues and peers. By doing this, we can focus our engagement with you as a supporter, donor or potential donor in the most effective way and ensure that we provide you with an experience that is appropriate for you.

For significant corporate financial donations, we also use publicly available sources to carry out due diligence on individuals who control companies and trusts and foundations, to meet money laundering regulations. We are committed to working in a transparent, ethical, responsible and honest way.

If you would rather your personal data was not used for the purposes of wealth screening, you can contact our Office on 0161 872 6017 or via email at <a href="mailto:info@ycwimpact.com">info@ycwimpact.com</a>

## Children and vulnerable people

#### Children

We are committed to protecting the privacy of the young people who engage with us through our website, at events and at schools. If you are under 16 and would like to get involved with the work of the YCW, please ensure you have consent from a parent or guardian before giving us your personal information.

Some of our young people's events request specific information about the age of participants and we may require explicit parental consent for this. We will only ever collect or process any personal information for a child under 13 with explicit parental consent. When we collect information about a child or young person aged under 16 we will make clear the reasons for collecting this information, as well as how the information will be used.

## Supporters in vulnerable circumstances

We are committed to protecting vulnerable supporters. We provide training to our volunteers who come into regular contact with supporters to be aware of, and to identify signs of, people in potentially vulnerable circumstances. We may record relevant personal information so that we can respond appropriately in future – for example, by ensuring no further marketing or fundraising requests are sent.

# How long do we keep personal data?

We will keep your personal data only for as long as we consider it necessary to carry out each processing activity. We maintain data retention criteria to help implement this. This takes account of our legal and accounting obligations, balancing this with what would be considered reasonable. We are required to keep details of financial transactions, including donations, for seven years to meet accountancy and HMRC requirements. We will anonymise or delete personal data if, after a period of seven years, we have not had any contact or communication from you (this will be measured on a rolling seven-year period) – subject to special circumstances concerning legacies. Many supporters kindly tell us that they have included a gift to the YCW in their will, or that they intend to do so. We retain their personal information indefinitely so that we can keep in touch during their lifetime and provide a caring and efficient legacy administration service.

#### Your rights

The YCW actively supports the principle of "fair and transparent" processing of your personal information. We support your rights in relation to your personal information under the General Data Protection Regulation, including the:

- right to be informed;
- right of access
- right to rectification
- right to erasure
- right to restrict processing
- right to data portability
- right to object
- rights related to automated decision-making including profiling

If you wish to exercise any of these rights, please contact the Data Protection Officer in writing at St Antony's House, Eleventh Street, Trafford Park, M17 1JF or via email at info@ycwimpact.com

## Requesting access to your personal data

You have a right to request access to the personal data that we hold about you. If you would like to request a copy of your personal data or have any questions in relation to your personal data, please contact us at <a href="mailto:info@ycwimpact.com">info@ycwimpact.com</a>

## • Security of your personal data

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage. When you provide your personal data through our website, this information is transmitted across the internet securely using high-grade encryption. As described elsewhere in this Privacy Notice, we may in some instances disclose your personal data to third parties. Where we discloses your personal data to a third party, we require that third party to have appropriate technical and organisational measures in place to protect your personal data.

The information that you provide to us will be held in our systems, which are located on our premises or those of an appointed third party, acting as our Data Processor. We may also allow access to your information by other third parties that act for us for the purposes described in this Privacy Notice or for other purposes approved by you.

# Uploading information to the YCW website

All material uploaded to our website is subject to approval by us before being used. By uploading material in the form of photographs, videos, stories or any other format onto our site you are automatically agreeing to the YCW editing and using your material on the website and in future promotional material or events. This agreement is lifelong and royalty free and non-exclusive to us.

You must be 18 or over and if not you must have the express permission of your parent or guardian to upload the material. Material must not violate any copyright laws, the rights of any third party or any other laws. Photographs and videos must have been taken with the knowledge of the subjects, or where the subjects are under 18, with the permission of their parent or guardian. All subjects must have given permission for the material to be used by us.

By submitting material you agree that we have the right to share the material with any third party involved in the submission and receipt of the material as well as any third parties which we use to act on their behalf.

Under certain laws and regulations we might be asked to disclose information to government agencies or employees. By submitting material you authorise us to do this without having to give you prior notice.

The YCW will use any material in accordance with our own data protection policy the Data Protection Act (1988) and the General Data Protection Regulations (GDPR 2018).

#### Cookies or other tracking technologies

In order to improve our services, to provide you with more relevant content and to analyse how visitors use our websites, we may use technologies, such as cookies or other tracking software. Please be aware that in most cases we will not be able to identify you from the information we collect using these technologies, as this is based on your Internet Protocol (IP) address only.

## Updates to our Privacy Notice

We may make changes to this Privacy Notice from time to time, including as part of the new European data protection legislation, which will come into force on 25 May 2018. We will update the Privacy Notice as and when required and we will publish any new version of this Privacy Notice on this page.

## • Contact information and telling us when things have changed

The YCW will occasionally provide you with the opportunity to opt in to receiving certain types of communication. If you are already receiving such communication, you do not need to opt-in again as your existing preference will persist until you provide explicit instruction that you want to opt out.

You can change your preferences on what you receive from us at any time, including fundraising and marketing materials or how we contact you. Let us know:

By calling our Office on 0161 872 6017 We welcome any questions, comments and By emailing us at <a href="mailto:info@ycwimpact.com">info@ycwimpact.com</a> requests regarding this Privacy Notice and these should be addressed By writing to us at to info@ycwimpact.com or YCW HQ **Data Protection Officer** YCW HQ St Antony's House Eleventh Street St Antony's House Trafford Park Eleventh Street M17 1JF Trafford Park M17 1JF